

February 18, 1998

MEMORANDUM TO: Distribution

FROM: Michael J. Rubino, Associate Director  
Acquisition Services Branch

SUBJECT: Policy Memorandum No. 98-005 – FDIC  
Procurement Credit Card Program

1. Purpose. The purpose of this Policy Memorandum is to change the Acquisition Policy Manual (APM) to clarify the permissible and prohibited uses of the procurement credit card.
2. Reference. APM 9.E.5.d., *Permissible, Prohibited, and Restricted Use*, page 9-17.
3. Scope. This Policy Memorandum is applicable to all Contracting Officers and other Acquisition Services Branch (ASB) personnel and to all Approving Officials, Credit Cardholders, and Accounting Contacts participating in the Procurement Credit Card Program.
4. Background. The policies and procedures governing the Procurement Credit Card Program are stated in APM 9.E., on page 9-13. The referenced section dealing with permissible and prohibited credit card use requires clarification and is the subject of this Policy Memorandum.
5. APM Change. In accordance with the foregoing, APM 9.E.5.d. (1) *Permissible Use* and (2) *Prohibited Goods or Services* are superseded by the following:

“9.E .5.d. *Permissible, Prohibited, and Restricted Use.*

- (1) **Permissible Use.** All goods or services that are not specifically included as prohibited or restricted, as described below, may be procured with the IMPAC Card.
  - (a) **Official Business.** The IMPAC Card may be used to procure goods or limited administrative services, under \$2,500, which are needed for official FDIC business only. Use for other than official FDIC business will result in immediate cancellation of the card and could lead to adverse personnel action. To differentiate from a personal credit card, the IMPAC Card was specifically designed to show the Great Seal of the United States and the words United States of America."

- (b) **Permissible Procurement Sources.** The IMPAC Card may be used at any establishment at which the VISA Card is accepted as a form of payment. Sources should be rotated to preclude repeated acquisitions from the same merchant. Use of Minority and Women-Owned Business (MWOB) firms is encouraged.
- (c) **Types of Acceptable Purchases.** The following goods and services are considered appropriate for purchase with the FDIC Credit Card in accordance with these procedures and other Corporation policies and procedures as applicable. This list is illustrative only and does not represent all of the acceptable types of purchases.

- [1] Building repairs;
- [2] Locksmith services;
- [3] Equipment purchases and repairs;
- [4] Catering services;
- [5] Refreshments/meals\*;
- [6] Flowers and other expressions of sympathy;
- [7] Membership fees and association dues;
- [8] Training once approved on SF-182;
- [9] Advertisement;
- [10] Conference/meeting rooms off-site;
- [11] Corporate vehicle repair and other services;
- [12] Duplicate keys;
- [13] Reconfiguration of workstations; and
- [14] Carpet repair.

\* This applies to the purchase of non-extravagant food and/or refreshments used during the ordinary course of **official FDIC business** conferences, meetings, luncheons, dinners, or other functions. Anticipated transactions shall be approved in advance (in writing or by e-mail) by the Associate Director-level or above in Headquarters or the Regional Director/Regional Manager in the Field.

- (2) **Prohibited Goods or Services.** In addition, certain types of procurements are strictly prohibited under any circumstances.
  - (a) Official travel expenses (transportation, hotel accommodations, meals, or vehicle rentals) for which the current FDIC American Express Card is used;
  - (b) Rental or lease of land or buildings;
  - (c) Telecommunications (telephone) services;
  - (d) Cash advances from bank tellers or automated teller machines;

- (e) Goods or services related to the management and disposition of assets held by FDIC in its receivership capacity, former receivership assets which have been obtained via corporate purchase, or receivership- related assets which may have been "assigned" to FDIC in its corporate capacity. These prohibited services include, but are not limited to, appraisals, surveys, environmental assessments, phase I environmentals, brokerage services, title policies or commitments, asset searches, or similar goods or services related to asset liquidation activities performed by the Division of Resolutions and Receiverships (DRR); and
- (f) Outside counsel services procured by the Legal Division.

6. Effective Date. This Policy Memorandum is effective retroactively from January 1, 1997.

7. Contact. If you have any questions, please call David McDermott on (202) 942-3434.

cc: Division Directors  
Office Directors  
Deputy Director, DOA  
Associate Directors, DOA  
Regional Directors  
Regional Managers

Distribution:

David McDermott	Debbie Reilly	Rodney Cartwright
Sandra West	Deirdre MacBain	Steve Metildi
Carolyn Follin	Brenda Butler	Tom Harris
Vance Brawley	Connie Knittle	Harry Baker
Howard Cox	Patricia McClintock	Mary Rann
David Lamoureux	Stephen Hanas	Greg Cofer
Helen Belletti	Dianna Strader	Joanna Lyckberg
Rex Simmons	Karen Savia	Angela Anderson
Dan Bendler	Paul Sherman	Kathleen Duffy
Oversight Managers	Credit Cardholders	Approving Officials
Accounting Contacts		